

From: Peter J. Brown [<mailto:pete@wildmoo.net>]  
Sent: Friday, November 10, 2006 7:31 PM  
To: ME, Connect  
Subject: Section 5 –Designation of Broadband Service and Eligible Areas

ConnectMe Authority:

re: Proposed Rulemaking / Section 5 –Designation of Broadband Service and Eligible Areas

I wish to submit the following comments --

With respect to the potential exclusion of satellite broadband as a viable option for residents and business in unserved and underserved areas, such a policy would greatly harm and otherwise undermine efforts to expand wireless broadband services statewide.

Therefor, with respect to Section 5 –Designation of Broadband Service and Eligible Areas, please amend as follows --

Satellite broadband has its limitations due to its performance during bad weather in particular, and its inability to overcome latency as well. Still, people are eager to access satellite broadband nonetheless, absent suitable and affordable alternatives.

Satellite can fill the gap, and provide an excellent broadband experience. It is not perfect, but it can do the job.

According to data provided in early November by CentrisBRIDGE, a joint project of Centris and Colorado-based The BRIDGE Data Group regarding satellite usage in the State of Maine, Maine's total household count of 539,930 included 131,381 households now subscribing to satellite TV services for a total HH penetration rate of 24%. This statistic speaks to the important role of satellite technology in rural Maine in particular.

In addition, a realistic estimate is that upwards of 3000 or more Maine households now use satellite broadband -- absent any formal state plan to promote or support satellite broadband -- based on numbers provided by Maryland-based Hughes Network Systems, the leading satellite broadband service provider in Maine, and data gathered informally from dealers who sell and install WildBlue Communications' satellite broadband systems which became available in Maine in late 2005.

Because there has been considerable discussion of Canada's potential role here and perhaps a bonding of Maine's strategies and interests with the broadband infrastructure and telecom strategies of the Maritimes and Quebec, it is important to note that the WildBlue satellite broadband service that is selling briskly statewide depends upon a broadband signal beamed all across the U.S. from a Canadian satellite, Anik F2.

Colorado-based WildBlue Communications will be launching a new broadband satellite, WildBlue 1, in late 2006. Hughes will be launching a new broadband satellite, Spaceway 3, in early 2007 as well. The emerging ConnectME strategy must accomodate this new satellite capacity along with existing satellite assets available nationwide.

A vast rural state like Maine must not exclude satellite broadband when so many people in Maine speak of the urgent need to expand the delivery of broadband services and to do whatever is necessary to achieve a household broadband penetration rate far in excess of the 31 per cent figure today.

The ConnectMe Authority credits the cable industry for making broadband technology available and affordable for the average American household via the cable industry's work on DOCSIS-based cable modem technology.

However, improvements to this same cable infrastructure which now supports widespread use of the cable modem technology was a direct result of competitive pressures exerted by satellite TV and DBS companies in particular, starting in the mid-1990's.

The success of wired Digital Subscriber Line (DSL) and cable modem services -- where speeds in the 20 Mbps-plus range have been achieved -- should not lead to any exclusion or undermining of established wireless broadband service alternatives such as satellite broadband on the basis that they will not meet a proposed inbound speed of 1.5 Mbps.

There is no basis for a determination that a broadband service cannot perform adequately at speeds well under 1.5 Mbps. In the absence of a suitable alternative, any broadband service platform that runs at only 600 kbps or 700 kbps or even slower speeds should not be discarded or excluded.

Rural American culture has been transformed by satellite TV. And now, rural Maine's future development is at risk. Rural Maine will suffer if satellite broadband is excluded from any state-supported broadband strategy and state-approved plan aimed at expanding broadband service delivery into unserved or underserved areas.

On a final note, I submit these comments mindful that I have failed to meet the Authority's November 1 deadline for the submission of comments. This was due to the fact that my schedule had been disrupted by a wind storm which had knocked out power here on my street on Mount Desert Island for the final 4 days of October -- two days longer than what we experienced during the 1998 ice storm.

I appreciate your consideration in this matter.

Peter J. Brown  
Mount Desert  
244-3408